

EXHIBIT A

From: Silverstein, Michael <MSilverstein@beneschlaw.com>
Sent: Wednesday, January 29, 2025 1:56 PM
To: Dave Kumagai <dkumagai@cgr-law.com>; Amanda Wong <awong@cgr-law.com>; Isaac Zaur <izaur@cgr-law.com>; Dan Wachtell <dan@danwachtell.com>
Cc: Connolly, J. Erik <econnolly@beneschlaw.com>; Kovacs, Caitlin <CKovacs@beneschlaw.com>
Subject: Heilbut, et al. v. Cassava Sciences, Inc., et al., No. 1:24-cv-05948 (S.D.N.Y.) - CONFIDENTIAL Agreement to Engage in Confidential Settlement Negotiations

Counsel,

As we previously indicated, our clients are open to resolving the above-captioned matter without judicial intervention. However, before beginning any settlement discussions, we would like to ensure that such discussions would be kept confidential and not disclosed to any third parties.

Accordingly, attached please find correspondence from Caitlin Kovacs that contains an Agreement to Engage in Confidential Settlement Negotiations. If you agree, please return a signed copy of this letter by Monday, February 3, 2025.

Thank you,
Michael

Benesch



[vCard](#) [Bio](#)

Michael B. Silverstein
(he/him/his)
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Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice



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Chicago, Illinois 60606-4637
Direct Dial: 312.624.6392
Fax: 312.767.9192
ckovacs@beneschlaw.com

January 29, 2025

VIA EMAIL
CONFIDENTIAL

Isaac B. Zaur
Amanda Wong
David Kumagai
Clarick Gueron Reisbaum LLP
220 Fifth Avenue, 14th Floor
New York, NY 10001

Daniel F. Wachtell
Law Office of Daniel F. Wachtell
90 Broad Street, 23rd Floor
New York, New York 10004

Re: *Heilbut, et al. v. Cassava Sciences, Inc., et al.*, No. 1:24-cv-05948 (S.D.N.Y.)
Agreement to Engage in Confidential Settlement Negotiations

Counsel:

This letter contains a confidentiality agreement for our respective clients to engage in confidential negotiations to settle the above-captioned matter. By signing below, our clients can assure themselves that they can engage in a productive and candid process to resolve their disputes without fear of disclosure to any third party. Therefore, please review and sign this letter, returning it to my attention no later than Monday, February 3, 2025.

The above-referenced matter has been filed by Adrian Heilbut, Jesse Brodtkin, and Enea Milioris ("Plaintiffs") and Dr. David Bredt and Dr. Geoffrey Pitt ("Intervenor Plaintiffs") against Cassava Sciences, Inc., Remi Barbier, and Dr. Lindsay Burns ("Defendants").

Plaintiffs and Defendants wish to meet, confer, and attempt to compromise and otherwise resolve the above-captioned case ("Settlement Negotiations").

Plaintiffs and Defendants agree and acknowledge that the Settlement Negotiations shall be confidential, privileged, and inadmissible for any purpose pursuant to Federal Rule of Evidence 408.

Plaintiffs and Defendants agree that they shall not disclose the substance of or existence of the Settlement Negotiations to any third party, including Intervenor Plaintiffs.

This agreement incorporates all statutory provisions and court rules for non-disclosure and confidentiality of verbal and written statements made in settlement negotiations.

Amanda Wong
Isaac B. Zaur
David Kumagai
Daniel F. Wachtell
January 29, 2025
Page 2

Please indicate your agreement with the terms of this confidentiality agreement by signing below.

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

/s/ Caitlin Alejandrina Kovacs

Caitlin Alejandrina Kovacs

Agreed to this ____ day of _____,
2025

Agreed to this ____ day of _____,
2025

Print name:

*Counsel for and authorized representative
of Adrian Heilbut, Jesse Brodtkin, and Enea
Miloris*

Print name:

*Counsel for and authorized representative
of Cassava Sciences, Inc., Remi Barbier,
and Dr. Lindsay Burns*